

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEVADA

3  
4 STEVEN R. DAVIS, an individual,  
5 Plaintiffs,

6 vs.

7 UNITEL VOICE, LLC, et al  
8 Defendants.

Case No.: 2:18-CV-00673-JCM-PAL

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF  
TIME TO RESPOND TO  
DEFENDANT'S MOTION TO  
DISMISS UNDER FED. R. CIV. P.  
12(b)(2) FILED SEPTEMBER 4,  
2018 (ECF No. 26).**

**(First Request)**

9  
10 **STIPULATION AND ORDER FOR EXTENSION OF TIME**  
11 **TO RESPOND TO DEFENDANT'S MOTION TO DISMISS UNDER**  
12 **FED. R. CIV. P. 12(b)(2) FILED SEPTEMBER 4, 2018 (ECF No. 26).**

13 (First Request)

14 Plaintiff Steven R. Davis, pro se, and Telecom Management Group, Inc., an Illinois  
15 corporation doing business as Unitel, sued as Unitel Voice, LLC, d/b/a Telecom Management  
16 Group, Inc. (the "Defendant"),<sup>1</sup> through its undersigned counsel of record, agree that upon the  
17 Court's approval, Plaintiff's response to Defendant's Motion to Dismiss (ECF No. 26), currently  
18 due on September 18, 2018, shall be due two weeks from that date, on October 2, 2018, for the  
19 reasons set forth below:

20 1. Defendant's Motion to Dismiss (ECF No. 26) was timely filed on September 4,  
21 2018.

22  
23 <sup>1</sup> Telecom Management Group, Inc., an Illinois corporation d/b/a Unitel maintains that it has been  
24 sued in error as Unitel Voice, LLC d/b/a Telecom Management Group, Inc., as stated in its Motion  
25 to Dismiss (ECF No. 26 at 1 n. 1); Plaintiff does not agree with Defendant's position.

Stipulation for Extension of Time to Respond to Motion to Dismiss

2. Plaintiff, via email on September 10, 2018, has requested an Extension to October 2, 2018, to file his response.

3. Plaintiff is *pro se* and asserts that he has limited access to legal resources and needs the additional time to craft his response.

4. Counsel for Defendant communicated Defendant's assent to this extension.

5. Accordingly, Plaintiff and Defendant agree that, upon the Court's approval, Plaintiff's response to Defendant's Motion to Dismiss shall be due on or before October 2, 2018.

6. Furthermore, upon receipt of Plaintiff's response, the Defendant shall have seven days to reply.

7. This Stipulation has been entered before Plaintiff's response to Defendant's Motion to Dismiss is due to the Court.

8. Pursuant to Local Rule 6-1, this is Plaintiff and Defendant's first request for an extension of this deadline.

9. The parties seek this extension in good faith and not for purposes of delay.

10. No party would be prejudiced by the granting of this stipulated motion for an extension of time.

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Stipulation for Extension of Time to Respond to Motion to Dismiss

1 Dated this 14th day of September 2018, by the undersigned Plaintiff and counsel  
2 for Defendant.

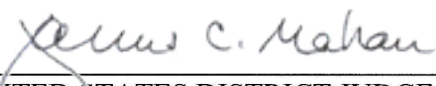
3  
4 Steve R. Davis, Pro Per  
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5 Las Vegas, NV 89120  
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7 /s/ J. Malcolm DeVoy  
J. Malcolm DeVoy (Nevada Bar No. 11950)  
8 Erica Bobak (Nevada Bar No. 13828)  
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Attorneys for Defendant  
12 Telecom Management Group Inc, d/b/a Unitel

13  
14 **ORDER**

15 For good cause appearing, the foregoing stipulation is GRANTED and it is ORDERED  
16 that Plaintiff's opposition to Defendant's Motion to Dismiss (ECF No. 26) shall be due on or before  
17 October 2, 2018, and Plaintiff's reply in support of its Motion to Dismiss seven days after Plaintiff  
18 serving his opposition to that motion.

19 Dated September 18, 2018.

20   
21 UNITED STATES DISTRICT JUDGE

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23  
24 Stipulation for Extension of Time to Respond to Motion to Dismiss